

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CORNWALL MANAGEMENT LTD and OLEG  
SOLOVIEV a/k/a OLEG VALENTINOVICH  
SOLOVIEV,  
Plaintiffs,

12 CIV 08551 (LLS)

**NOTICE OF FILING AFFIDAVIT  
OF MAILING TO DEFENDANTS,  
THOR UNITED CORP. a/k/a THOR  
UNITED CORPORATION AND  
ATLANT CAPITAL HOLDINGS,  
LLC**

v.

THOR UNITED CORP. a/k/a THOR UNITED  
CORPORATION, JON DOE THOR ENTITIES,  
ATLANT CAPITAL HOLDINGS, LLC, OLEG  
BATRACHENKO a/k/a OLEG BATRATCHENKO,  
a/k/a O.V. BATRACHENKOV, PETER KAMBOLIN,  
NORTH 3RD DEVELOPMENT, LLC, and ABRAHAM  
BENNUN  
Defendants.

Named of Assigned Judge  
Honorable Louis L. Stanton

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Plaintiffs, CORNWALL MANAGEMENT LTD and OLEG SOLOVIEV a/k/a OLEG  
VALENTINOVICH SOLOVIEV, by and through undersigned counsel, hereby gives notice of  
filing the enclosed Affidavit of Mailing to Defendants, Thor United Corp. a/k/a Thor United  
Corporation; and Atlant Capital Holdings, LLC.

Dated: March 13, 2013  
New York, New York

Respectfully submitted,  
BOND SCHOENECK & KING  
Counsel for Plaintiffs Cornwall  
Management Ltd. and Oleg Soloviev  
330 Madison Avenue, 39th Floor  
New York, NY 10017  
Tel. 646-253-2318  
Fax. 646-253-2301  
By: /s Michael P. Collins, Esq.  
Michael P. Collins, Esq.

Cherish A. Thompson and Associates, P.A.

*Co-Counsel for Plaintiffs*  
Brickell Bay Office Tower  
1001 Brickell Bay Drive, Suite 2014  
Miami, Florida 33131  
Telephone: 305.639.8600  
Facsimile: 305.402.2828  
eService@cherishthompson.com  
By: /s Cherish A. Thompson, Esq.  
Cherish A. Thompson, Esq. (CT-7007)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court which sent e-mail notification of such filing to all CM/ECF participants in this case and via regular US mail to all participants who are not on the list to receive e-mail notice/service for this case on this 13th day of March 2013. I FURTHER CERTIFY that a true and correct copy of the foregoing was served via U.S. Regular Mail on this 13th day of March 2013, to Defendants, **Thor United Corp.**, c/o the New York Secretary of State, 123 William Street #20, New York, NY 10038; **Atlant Capital Holdings, LLC**, c/o the New York Secretary of State, 123 William Street #20, New York, NY 10038; and **Peter Kambolin**, 1830 S. Ocean Drive, #4909, Hallandale, FL 33009.

/s Cherish A. Thompson, Esq.  
Cherish A. Thompson, Esq.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CORNWALL MANAGEMENT LTD and OLEG  
SOLOVIEV a/k/a OLEG VALENTINOVICH  
SOLOVIEV,  
Plaintiffs,

12 CIV 08551 (LLS)

**AFFIDAVIT OF MAILING**

v.

THOR UNITED CORP. a/k/a THOR UNITED  
CORPORATION, JON DOE THOR ENTITIES,  
ATLANT CAPITAL HOLDINGS, LLC, OLEG  
BATRACHENKO a/k/a OLEG BATRATCHENKO,  
a/k/a O.V. BATRACHENKOV, PETER KAMBOLIN,  
NORTH 3RD DEVELOPMENT, LLC, and ABRAHAM  
BENNUN  
Defendants.

Named of Assigned Judge  
Honorable Louis L. Stanton

I, CHERISH A. THOMPSON, affirm under penalty of perjury that:

1. My name is Cherish A. Thompson. I am over the age of 18 and am otherwise *sui juris*. I am the attorney of record for Cornwall Management Ltd. and Oleg V. Soloviev ("Plaintiffs") in the instant lawsuit.

2. I make this affirmation based on my personal knowledge and based upon my review of certain business records generated in the ordinary course. The business records were made at or near the time of the recorded act or event; were made by or from information transmitted by a person with knowledge; were kept in the ordinary course of a regularly conducted business activity and it is the regular practice to make, keep, and rely upon such records.

3. On March 13, 2013, in compliance with N.Y. CVP. Law §3215(4): NY Code, I effected additional service by first class mail of the summons and pleadings in the instant lawsuit, including but not limited to the amended complaint, to Defendant, Thor United Corp., to its last known address, 1370 Broadway, 5th Floor, Unit 530, NY, NY 10018, which service was accompanied by a notice to the corporation that service was made pursuant to §306(b) of the Business Corporation Law. A true and correct copy of the notice is attached hereto and incorporated herein as **Exh. A**.

4. Also on March 13, 2013, in compliance with N.Y. CVP. Law §3215(4): NY Code, I effected additional service by first class mail of the summons and pleadings in the instant lawsuit, including but not limited to the amended complaint, to Defendant, Atlant Capital Holdings, LLC, to its last known addresses, 551 Fifth Avenue, New York, New York 10017 and c/o Peter Kambolin, 641 Fifth Ave., 38G, New York, NY 10022, which service was accompanied by a notice to the corporation that service was made pursuant to §306(b) of the Business Corporation Law. A true and correct copy of

the notice is attached hereto and incorporated herein as Comp. Exh. B.

Under penalties of perjury, pursuant to 28 U.S.C. §1746, I declare that I have read the foregoing Affidavit of Mailing, and that the facts stated herein are true.

DATED: New York, New York  
March 13, 2013.

A handwritten signature in cursive script, appearing to read 'C. Thompson', written in black ink.

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Cherish A. Thompson, Esq.

# **EXHIBIT A**



CHERISH A. THOMPSON AND ASSOCIATES, P. A .  
Brickell Bay Office Tower

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**NOTICE OF SERVICE PURSUANT TO  
§306(b) OF THE BUSINESS CORPORATION LAW**

[VIA U.S. FIRST CLASS MAIL]

March 13, 2013

TO: THOR UNITED CORP.  
1370 Broadway, 5th Floor, Unit 530  
New York, NY, 10018

**Re: Cornwall Management Ltd. and Oleg Soloviev a/k/a Oleg Valentinovich  
Soloviev v. Thor United Corp., et. al., Case No. 12-CIV-08551-LLS**

Dear Sir or Madam:

PURSUANT TO N.Y. CVP. LAW §3215: NY CODE, you are hereby notified that Thor United Corp., defendant in the above-referenced lawsuit, which was filed on November 21, 2012, in the United States District Court for the Southern District of New York, has been served pursuant to Section 306(b), of the Business Corporation Law of New York.

This constitutes additional service of the summons by first class mail upon Thor United Corp., at its last known address, 1370 Broadway, 5th Floor, Unit 530, New York, NY 10018. Enclosed herein are true and correct copies of the following additional pleadings filed with the Court: (i) original Summons, (ii) Rule 7.1 corporate Disclosure Statement [D.E. 2], (iii) the Stipulation [D.E. 7], and (iv) the Amended Complaint [D.E. 8].

**Be advised that no default judgment shall be entered against the Defendant, Thor United Corp., before the expiration of twenty-one (21) days from the date of service of this notice, or prior to April 3, 2013.**

I hereby certify that a copy of this notice and the pleadings referenced herein have been furnished to the Defendant, Thor United Corp., by first class mail, at its last known address, 1370 Broadway, 5th Floor, Unit 530, New York, NY 10018.

Please govern yourself accordingly.

Cherish A. Thompson, Esq.

Enclosures

**Comp.**  
**EXHIBIT B**



CHERISH A. THOMPSON AND ASSOCIATES, P. A .  
Brickell Bay Office Tower

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**NOTICE OF SERVICE PURSUANT TO  
§306(b) OF THE BUSINESS CORPORATION LAW**

[VIA U.S. FIRST CLASS MAIL]

March 13, 2013

TO: Atlant Capital Holdings, LLC  
551 Fifth Avenue  
New York, New York 10017

**Re: Cornwall Management Ltd. and Oleg Soloviev a/k/a Oleg Valentinovich  
Soloviev v. Thor United Corp., et. al., Case No. 12-CIV-08551-LLS**

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I hereby certify that a copy of this notice and the pleadings referenced herein have been furnished to the Defendant, Atlant Capital Holdings, LLC, by first class mail, at its last known address, 551 Fifth Avenue, New York, New York 10017.

Please govern yourself accordingly.

Cherish A. Thompson, Esq.

Enclosures



CHERISH A. THOMPSON AND ASSOCIATES, P. A.  
Brickell Bay Office Tower

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**NOTICE (Second) OF SERVICE PURSUANT TO  
§306(b) OF THE BUSINESS CORPORATION LAW**

[VIA U.S. FIRST CLASS MAIL]

March 13, 2013

TO: Atlant Capital Holdings, LLC  
c/o Peter Kambolin  
641 Fifth Ave., 38G  
New York, NY 10022

**Re: Cornwall Management Ltd. and Oleg Soloviev a/k/a Oleg Valentinovich  
Soloviev v. Thor United Corp., et. al., Case No. 12-CIV-08551-LLS**

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This constitutes additional service of the summons by first class mail upon Atlant Capital Holdings, LLC, at its other last known address, c/o Peter Kambolin, 641 Fifth Ave., 38G, New York, NY 10022. Enclosed herein are true and correct copies of the following additional pleadings filed with the Court: (i) original Summons, (ii) Rule 7.1 corporate Disclosure Statement [D.E. 2], (iii) the Stipulation [D.E. 7], and (iv) the Amended Complaint [D.E. 8].

**Be advised that no default judgment shall be entered against the Defendant, Thor United Corp., before the expiration of twenty-one (21) days from the date of service of this notice, or prior to April 3, 2013.**

I hereby certify that a copy of this notice and the pleadings referenced herein have been furnished to the Defendant, Atlant Capital Holdings, LLC, by first class mail, at its other last known address, c/o Peter Kambolin, 641 Fifth Ave., 38G, New York, NY 10022.

Please govern yourself accordingly.

Cherish A. Thompson, Esq.

Enclosures